ORIGINAL FILE

ANCHORAGE AMATEUR RADIO CLUB, INC. VEC
3628 TURNAGAIN PARKWAY
ANCHORAGE, ALASKA 99517

RECEIVED
OCT 19 1992
MAIL BRANCH
RECEIVED
OCT 19 1992
Federal Communications Commission
Office of the Secretary

October 14, 1992

Secretary, Federal Communications Commission
Washington, D.C. 20554

Re: Comments to Petition for Rulemaking
PR Docket No. 92-167

Commissioners:

This letter contains the comments of the Anchorage Amateur Radio Club, Inc. VEC to the Notice of Proposed Rule Making released August 6, 1992 in PR Docket 92-167. The Notice was filed on the Commission's own motion to provide a convenient licensing procedure for foreign amateur operators who will be in the United States for only a short time. Generally, we support the proposed rules, but we have a few serious concerns on the practical application of such licensing procedures as currently proposed.

First, we are concerned about how a Volunteer Examiner is supposed to know if the license which is presented at the testing session is actually what it is represented to be. Since many or even most of the licenses will probably be in a foreign language and on unfamiliar forms, authenticity of the license is entirely unverifiable by both the VEC and, in fact, by the FCC. In addition, how is the VEC supposed to know what control operator privileges are available to the foreign amateur, particularly if the applicant cannot supply the information off the top of his or her head. What if the applicant-supplied information is incorrect?

Secondly, are the temporary operating privileges obtainable more than once or is the license a once in a lifetime event? For example, assume a foreign amateur operator enters the U.S. in January 1993 and gets temporary operating privileges beginning immediately upon arrival. Assume that the foreign amateur goes home in March 1993 and then returns to the U.S. in September 1993. Can the foreign amateur get another temporary license? What if the foreign amateur returns five years later? How will the VEC know if the foreign amateur has already had a temporary license when it is presented with the foreign license at a testing session? It is not entirely clear to us whether by passing element 5 at the expiration of the first temporary license, whether another license is appropriate.

No. of Copies rec'd 0
List A B C D E

Finally, why is there a higher standard (18 out of 20 questions) for passing element 5 than there is for all other elements. For simplicity, we suggest that the 74% standard be adopted.

If you have any questions regarding our comments, please do not hesitate to write us at the address listed above.

ANCHORAGE AMATEUR RADIO CLUB, INC. VEC

Michael S. McLaughlin, WA7USX
Board Member